

EXHIBIT 16

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2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF NEW YORK

4 -----x

5 In re Application of FORENSIC NEWS
6 L.L.C. and SCOTT STEDMAN for an Order
7 Pursuant to 28 U.S.C. subsection 1782
8 to Conduct Discovery for Use in a
9 Foreign Proceeding
10 Case No. 1:22:mc-00993-KAM

11 -----x

12

13 Remote deposition
14 May 24, 2022
15 9:30 a.m.

16

17

18 VIDEO-RECORDED VIDEOCONFERENCE DEPOSITION of

19

20 RICHARD FRANKEL, before Michele Moskowitz, a
21 shorthand reporter and Notary Public of the State
22 of New York.

23

24

25

REF: 5233973

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2

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1 FRANKEL

2 you know a man named Walter Soriano?

3 A. I do.

4 Q. When did you first meet Mr. Soriano?

5 A. Probably -- before I started the FBI.

6 Probably in late 2015, but I couldn't tell you.

7 It could have been September. It could have been
8 earlier, it could have been later, but in 2015.

9 Q. Okay. How did you come to meet
10 Mr. Soriano in --

11 A. I was --

12 Q. -- late 2015?

13 A. I'm sorry, I interrupted you.

14 Q. That's okay.

15 A. I was told that he was looking for
16 somebody to start basically a U.S. presence of
17 his company. I had been interviewing with others
18 at that time and he was one of the people that I
19 interviewed with.

20 Q. Okay. Who told you that Mr. Soriano
21 was looking for someone to start a U.S. presence?

22 A. It was a former agent by the name of
23 Mark Rossini.

24 Q. And by "his company," are you
25 referring to USG Security Limited?

1 FRANKEL

2 Mr. Soriano; is that right?

3 A. Correct.

4 Q. Okay. So did there come a time when
5 you started to work for USG?

6 A. Yes.

7 Q. Okay. Do you remember your start
8 date at USG?

9 A. I think it was within -- if it was
10 not the Monday after, it was very soon
11 thereafter.

12 Q. Okay. So it would have been very
13 soon after January 29, 2016?

14 A. Without a doubt.

15 Q. Correct?

16 A. Yes.

17 Q. Okay. So I think you testified to
18 this earlier, but just to confirm, did you first
19 learn about USG from the man named Mark Rossini?

20 A. Yes.

21 Q. Okay. And Mr. Rossini explained to
22 you that Mr. Soriano was looking for someone to
23 establish a U.S. presence for USG security; is
24 that accurate?

25 A. Yeah. That, and I guess do work for

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FRANKEL

2

Mr. Rybololev?

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A. Well, for USG, again, I can't say for sure other than what I did at that time, which was here in the United States, there were a couple of different areas that we were trying to work on for Mr. Rybololev regarding his art fraud, but basically to prove that he was in fact a victim of art fraud.

10

Q. Okay. And when did you perform this work on behalf of Mr. Rybololev?

11

A. 2016 until I -- until I left USG.

12

Q. Okay. And can you name any other USG employees who worked on this project for Mr. Rybololev?

13

A. Mr. Soriano did. I don't know of any others that would have worked on it. At least here in the United States, I was by myself.

14

Ms. Rossini, who I mentioned before, he was a -- he had done contract work, maybe he did some work, but I don't remember specifics. And I'm not even sure he actually all worked on the case or not.

15

Q. Okay. And did Mr. Rossini work for USG --

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FRANKEL

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A. He?

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Q. -- when you performed the work on
behalf of Mr. Rybololev?

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8

A. Again, I don't know if he actually
did do work on it. It's just that I mentioned
Mark as a possibility, but I have no further
knowledge of it.

9

10

11

Q. Okay. And why do you mention
Mr. Rossini as a possibility as someone who might
have worked on this case?

12

13

14

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16

17

A. Because Mark and I definitely talked
during this time period and Mark would be in the
United States and outside the United States, so
if there was anyone, that was who I would have
worked with, but I don't remember any specifics
as to actually doing it.

18

Q. Have you ever met Mr. Rybololev?

19

A. Yes.

20

21

Q. Okay. And was this in the scope of
your employment with USG?

22

A. Yes.

23

24

Q. Okay. About how many times did you
meet with him?

25

A. I believe twice.

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FRANKEL

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USG is not included on your LinkedIn resume?

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A. I don't include a lot of things on my LinkedIn resume at this point.

5

Q. Okay. Why did you not include your employment at USG on your LinkedIn resume?

7

A. I only include what I consider to be the highlights at this point.

9

Q. Why didn't you consider your employment with USG a highlight?

11

A. It was for a year and, to be quite honest, I didn't get them any business, I wasn't very good at it, getting them the -- bringing the business into the company.

15

Q. Okay. So setting aside Mr. Soriano, have you contacted anyone associated with USG since you left?

18

A. Well, as -- again, the attorney-client -- I've talked to Mr. Shlomo and I forgot his -- Reichstein or -- I always screw up his last name. So I've talked to him once or twice and I do talk with Mark Rossini once in a while.

23

Q. Okay. In what context did you speak with Mr. Rechtschaffen after 2017?

25

A. This would be as an attorney with --